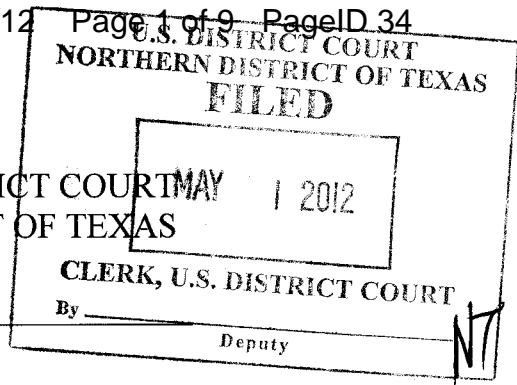


ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

ERIKA SUSAN PERDUE

§  
§  
§  
§  
§

No.

12CR-134-L

INDICTMENT

The Grand Jury charges:

Count One

Transporting and Shipping Child Pornography  
(Violation of 18 U.S.C. § 2252A(a)(1))

On or about January 4, 2012, the defendant, **Erika Susan Perdue**, in the Dallas Division of the Northern District of Texas, knowingly transported and shipped child pornography using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, by using the Internet and file-sharing software to share and transmit image and video files depicting minors engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256, to another software user outside the state of Texas, including the following described images:

File name	Description
! 2yo + mom+dadf..-4.wmv	A video file depicting a female placing her tongue on the genitals of a minor nude female child. Also depicted is a male penetrating the genitals of the same minor female child.

In violation of 18 U.S.C. § 2252A(a)(1).

Count Two  
Transporting and Shipping Child Pornography  
(Violation of 18 U.S.C. § 2252A(a)(1))

On or about January 5, 2012, the defendant, **Erika Susan Perdue**, in the Dallas Division of the Northern District of Texas, knowingly transported and shipped child pornography using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, by using the Internet and file-sharing software to share and transmit image and video files depicting minors engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256, to another software user in Texas, including the following described images:

<b>File name</b>	<b>Description</b>
<b>2009 private 5yo Kippy Molested.wmv</b>	A video file depicting an adult male penetrating the genitals of a minor female with his finger.

In violation of 18 U.S.C. § 2252A(a)(1).

Count Three  
 Receipt of Child Pornography  
 (Violation of 18 U.S.C. § 2252A(a)(2))

On or about February 14, 2012, in the Dallas Division of the Northern District of Texas, defendant, **Erika Susan Perdue**, knowingly received child pornography that had been mailed, shipped, and transported in interstate commerce by any means, including by computer, by downloading from the internet to her home computer, using the internet and peer-to-peer software, visual depictions of minors engaged in sexually explicit conduct as defined in 18 U.S.C. § 2256, including the following:

<b>File name:</b>	<b>Description:</b>
stil_1327231761_1467499_132.png	An image file depicting a individual, gender unknown, placing his/her tongue on the genitals of a minor female.
stil_1327231761_1467499_139.png	A lewd and lascivious image file depicting two females wearing only black panties, touching the genitals of a minor female who is wearing black fishnet stockings.
stil_1327231761_1467499_140.png	An image file depicting a nude minor female wearing a neck collar attached to a chain whose hand is inside the genitals of another female.

In violation of 18 U.S.C. § 2252A(a)(2).

Count Four  
 Possession of Child Pornography  
 (Violation of 18 U.S.C. § 2252A(a)(5)(B))

On or about April 10, 2012, in the Dallas Division of the Northern District of Texas, defendant, **Erika Susan Perdue**, knowingly possessed material that contained child pornography that was mailed, shipped, and transported using any means and facility of interstate and foreign commerce and was in and affecting interstate commerce by any means, including by computer, and which was produced using materials that had been mailed, shipped and transported in interstate and foreign commerce, in that the defendant possessed a Western Digital hard drive that contained visual depictions of minors engaged in sexually explicit conduct as defined in 18 U.S.C. § 2256, including the following described images:

<b>File Name:</b>	<b>Image Description:</b>
! New ! (Pthc) 2007 Tara 8Yr - Ass Fuck and Ass Vibrator.wmv	A video file depicting a male penetrating the genitals of a nude minor female. The video also depicts a male penetrating the minor female's anus with an object.
(-Jho-)Tiny Tessa (4) Ass-Fucked Screaming 2008.wmv	A video file depicting a nude male engaged in anal intercourse with a nude minor female. The female is screaming.
!2006 Nina Fucked in Ass @ 4Yo Kleuterkutje Ptsc.3gp	A video file depicting a male in a sitting position. A minor girl wearing a blue flowered dress and tennis shoes is holding his penis. Then the male penetrates her genitals with his penis and then penetrates her anus with his penis.
3-Yo-Stephanie-Raped.mpg	A video file depicting a male penetrating the genitals of a minor female and then ejaculating on her stomach.

3Yo 4Yo Forced to Suck (3min) Babyshivid kleuterkutje.mpg	A video file depicting a minor female, wearing a black hooded mask, engaged in oral-genital and genital-genital contact with a male.
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In violation of 18 U.S.C. § 2252A(a)(5)(B).

Notice of Forfeiture  
(18 U.S.C. § 2253(a)(1) and (3))

Upon conviction of any or all of the offenses alleged in this Indictment and pursuant to 18 U.S.C. § 2253(a), the defendant, **Erika Susan Perdue**, shall forfeit any visual depiction described in 18 U.S.C. § 2252 and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in the respective offense; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the respective offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the respective offense and any property traceable to such property.

The above-referenced property subject to forfeiture from the defendant includes, but is not limited to, the following: Personal Property

1. One Dell Inspiron N5040, serial number D4LHNP1 containing a Western Digital hard drive, serial number WX71E71KHP22.

A TRUE BILL

Andrea L. Fuggle  
FOREPERSON

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

Camille E. Sparks  
CAMILLE E. SPARKS  
Assistant United States Attorney  
Texas State Bar No. 00790878  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Telephone: 214.659.8600  
Facsimile: 214.659.8809  
camille.sparks@usdoj.gov

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

ERIKA SUSAN PERDUE

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INDICTMENT

18 U.S.C. § 2252A(a)(1)  
Transporting and Shipping Child Pornography

18 U.S.C. § 2252A(a)(2)  
Receipt of Child Pornography

18 U.S.C. § 2252A(a)(5)(B)  
Possession of Child Pornography

18 U.S.C. 2253(a)(1) and (3)  
Notice of Forfeiture

4 Counts

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A true bill rendered

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DALLAS

*Andrew L. Fuggle*  
FOREPERSON

Filed in open court this \_\_\_\_\_ day of May, A.D., 2012.

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Clerk

No Warrant to Issue - Defendant Released on Bond: 04/12/2012

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*James C. Smith* 5/1/12  
UNITED STATES DISTRICT/MAGISTRATE JUDGE

Magistrate Complaint 3:12-MJ-00154-BD



**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**Related Case Information**

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☐ Yes ☒ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number:

Search Warrant Case Number

R 20 from District of

**3 - 12CR - 134 - L**

Magistrate Case Number: 3:12-MJ-00154-BD

**1. Defendant Information**

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☐ Yes ☐ No

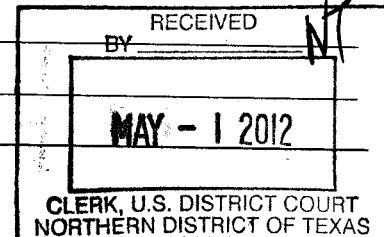
Defendant Name

**ERIKA SUSAN PERDUE**

Alias Name

Address

County in which offense was committed: Dallas, Texas



**2. U.S. Attorney Information**

**AUSA Camille E. Sparks**

**Texas Bar No. 00790878**

**3. Interpreter**

☐ Yes ☒ No If Yes, list language and/or dialect:

**4. Location Status : No Warrant to Issue, Released on Bond: 04/12/2012**

Arrest Date - 04/10/2012

- ☐ Already in Federal Custody  
☐ Already in State Custody  
☐ On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: **4** ☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
18 U.S.C. § 2252A(a)(1)	Transporting and Shipping Pornography	1 & 2
18 U.S.C. § 2252A(a)(2)	Receipt of Child Pornography	3
18 U.S.C. § 2252A(5)(B)	Possession of Child Pornography	4
18 U.S.C. § 2253(a)(1) and (3)	Forfeiture Notice	

Date April 26, 2012

Signature of AUSA:

*Camille E Sparks*  
Camille E. Sparks